



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MEB:SE  
F. # 2018R00035

*271 Cadman Plaza East  
Brooklyn, New York 11201*

June 16, 2021

By Email and FedEx

Arthur L. Aidala (Counsel for Steven Nerayoff)  
Aidala, Bertuna & Kamins, P.C.  
546 Fifth Avenue  
New York, NY 10036  
212-486-0011

Re: United States v. Steven Nerayoff  
Docket No. 20-CR-008 (MKB)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following additional discovery with respect to the above-referenced matter. This submission supplements the government's earlier disclosures to you. With this production, the government renews its request for reciprocal discovery from the defendant.

Enclosed on the flash drive is the material, bates-stamped DOJ-000008557 – DOJ-000008668 and AH00000001 – AH00052815, listed in Appendix A (attached). This material is subject to the to the October 18, 2019 protective order and may not be disseminated beyond your defense team and your client. See ECF Docket Entry 21.<sup>1</sup>

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

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<sup>1</sup> If you would like to share or reproduce any of the material and believe that it would not identify any victim in this case, please contact us.

Very truly yours,

MARK J. LESKO  
Acting United States Attorney

By: /s/  
Mark E. Bini  
Sarah Evans  
Assistant U.S. Attorney  
(718) 254-8761/6490

Attachment  
Enclosure

**APPENDIX A**

June 16, 2021- Discovery Production (Nerayoff) 20 CR 008 (MKB)		
Description	Beginning Bates	End Bates
Text conversation	DOJ-000008557	DOJ-000008668
Records and communications regarding and with Steven Nerayoff and Alchemist LLC, including- but not limited to- emails, calendar invitations, contracts, and agreements	AH00000001	AH00000688
Emails and calendar invitations	AH00000689	AH00008959
Emails, Share Purchase Agreements, Pay stubs, Invention Assignment Agreements, Notice of Share Option Grant, Offer Letter	AH00008960	AH00009081
Emails	AH00009082	AH00051473
Text Messages, E-mails, WhatsApp Messages	AH00051474	AH00052809
Text messages	AH00052810	AH00052815